



Andrew T. Chesley, Executive Director
San Joaquin Council of Governments
555 E Weber Avenue
Stockton, CA 95202-2804

30 April 2018

RE: Comments on the 2018 SJCOG Regional Transportation Plan / Sustainable Communities Strategy Draft Plan Update

Dear Mr. Chesley:

On behalf of the undersigned organizations, thank you for this opportunity to comment on the 2018 SJCOG Regional Transportation Plan / Sustainable Communities Strategy draft update. We appreciate the work that San Joaquin COG staff, committees, and Council members have invested in this draft plan.

In particular, we'd like to acknowledge the outreach efforts that were coordinated with local organizations to reach out to underserved low-income communities and communities of color. In ClimatePlan's report, "Leading the Way: Policies and Practices for Sustainable Communities Strategies,"¹ we noted the importance of partnering with local organizations to increase

¹ ["Leading the Way: Policies and Practices for Sustainable Communities"](#). ClimatePlan. 2016.

community engagement and participation in this process. We are appreciative to see SJCOG replicate this best practice and hope this type of coordination continues in the future.

Our organizations believe that land use and transportation planning must be well-aligned to achieve positive outcomes for San Joaquin communities, including: cleaner air; improved public health; economic vitality; safe and affordable access to schools, jobs, and services; housing and transportation choices; preservation of working lands and wildlands; and social equity. To that end, we are committed to supporting ambitious and achievable round two implementation of SB 375.

Performance Indicators and Strategies

Improve Air Quality and Reduce Greenhouse Gases

The 2018 draft RTP/SCS plan performance measures summary indicates expected GHG per capita reductions of -17.60% (2035) and -7.00% (2020), exceeding round two targets for SJCOG (5% under 2005 baseline by 2020 and 10% under 2005 baseline by 2035). We are encouraged to see such ambitious GHG reduction emissions from SJCOG, which also exceed the round three targets, and commend staff for their hard work on this plan. However, we are concerned that the vehicle miles traveled (VMT) per capita metric, used as a proxy for emissions reductions, moves only 0.007 from 2042 business-as-usual scenario. We would like to see stronger VMT reductions that better align with the plan's GHG reduction emissions or better transparency to understand why the VMT decline is smaller than the GHG reduction emissions. To achieve this goal, we recommend either:

- Substantially increasing VMT reductions by prioritizing emission reduction strategies, including increased funding for transit and active transportation, prioritization of infill development, or
- Include a narrative that explains how the transportation and land use model anticipates the VMT/GHG reduction emissions relationship. This narrative should also clarify the relationship between VMT/GHG reduction emissions and include projected change over time due to electrification, increased fuel economy, and other factors.

Building in existing communities and protecting farmland

The San Joaquin valley is home to some of the most productive farmland on Earth, and farming remains a significant economic sector as well as a cultural identity for the county and its communities. Prime farmland and critically important wildlands can and should be protected through careful, deliberate infill development and economic development within existing communities. Infill development will allow for population growth and stimulate economic activity in town and city cores, while guarding against unnecessary (and expensive) build-out of taxpayer-funded municipal infrastructure outside of the existing urban footprint. We recommend that 2018 RTP/SCS land growth forecast direct all new growth to occur as infill development or within established urban growth boundaries. Additionally, we suggest developing or adopting

conservation-related criteria into highway project prioritization scoring.²

Tracking Health and Wellness indicators

We strongly support SJCOG's pilot program to track health and Wellness indicators, including weekly total walking minutes per person, daily total recreational physical activity minutes per person, average body mass index, and general poor health (as self-reported via the California Health Interview Survey). We believe this pilot program builds upon SJCOG's work with public health leaders in the 2014 plan development process, as well as the active role that SJCOG took in regards to the Community Health Assessment and Community Health Improvement Program. We are excited to see SJCOG continue to lead in its incorporation of public health into the RTP. We recommend the inclusion of the following metrics to further elevate public health:

- "Healthy Neighborhood" index of park access, tree canopy, supermarket access, distance from liquor stores, and retail access³
- "Clean environment" index of diesel PM emissions, water contamination, ozone, and PM 2.51 (*ibid.*)

We also recommend that these health and Wellness indicators inform transportation project selection. To achieve the goals of SB 375—and create healthier communities—it is essential that these indicators inform the prioritization of transportation projects. We recommend the transportation projects with the highest health benefits (as scored by these indicators) should be elevated and funded before other projects, that may exacerbate public health issues.

Ensure the strategies to achieve GHG reduction targets maximize social equity

Low-income communities and communities of color have contended with a long history of transportation and land use policies that have created gaps in opportunity and institutionalized discriminatory practices. Without explicit strategies to promote and safeguard equity, there is real risk of exacerbating inequalities, including displacement along transit corridors and in city centers and nearby neighborhoods. Already, San Joaquin county is home to significant numbers long-distance commuters that work in the San Francisco Bay Area⁴; as housing costs rise in the nine counties that compose that region the megaregion (including San Joaquin county) can expect an influx of new residents. Displacement fragments communities and identity, and often drives the displaced to edge communities that lack robust transit and necessitate long commutes and attendant emissions associated with older, affordable motorized vehicles. We recommend the inclusion of the following social equity metrics as performance indicators:

- Number of new affordable units⁵
- Number of new affordable units within a half-mile of high quality transit⁶

² "[Sustainable Communities Strategies and Conservation](#)". The Nature Conservancy. Page 3.

³ Potential data source: [Healthy Places Index](#). Public Health Alliance of Southern California.

⁴ "[2018 Regional Transportation Plan and Sustainable Communities Strategy Draft Plan: Appendix M2](#)". Page 10.

⁵ Potential data source: Department of Housing and Community Development

⁶ Potential data source: American Community Survey; we recommend ARB develop a GIS layer of high-quality transit.

- Average share of low-income residents' household income consumed by transportation and housing⁷
- Jurisdictions with Housing Elements in compliance⁸
- Jurisdictions with anti-displacement policies⁹
- Jobs-Housing fit^{10,11}

Ensure diverse housing options in all neighborhoods

Current draft language states that diverse housing options will be concentrated within designated environmental justice neighborhoods at higher rates than other neighborhoods. By clustering different housing types within communities that experience higher rates of environmental and social burdens the RTP/SCS plan may unintentionally be promoting the concentration of neighborhood poverty and segregation. Research shows that providing multifamily and subsidized housing options in all neighborhoods increases household access to opportunity by ensuring residents of all income levels are able to access high-quality schools, jobs and businesses. Broadening the location of diverse housing options would also fall in line with federal and state fair housing goals. We suggest the COG direct staff to develop policy recommendations that can be turned into an “action plan” to be acted on after passage of the RTP. Such an action planning process could be used to create policy solutions related to housing, active transportation, jobs, etc.

Investment Plan and Funding

Legislative guidance for California’s greenhouse gas reduction efforts includes maximizing social and economic benefits. In addition to lowering vehicle miles traveled (VMT), prioritizing spending on active transportation and transit projects offers substantially more social and economic benefits than roadway projects. Spending \$10 million on public transit yields approximately \$32 million in increased economic activity (APTA¹²). Additionally, transit reduces congestion, provides access to jobs, curbs emissions, and increases mobility for youth and seniors. Spending on active transportation generates a number of positive public health impacts, including lower risk of heart disease, type-2 diabetes, and high-blood pressure (Tulare Council of Governments¹³). Moreover, active transportation infrastructure facilitates last-mile transit access; improves mobility for seniors, youth, and low-income residents; improves

⁷ Data source: Center for Neighborhood Technology H+T Affordability Index

⁸ Data source: Department of Housing and Community Development

⁹ Potential data source: We recommend ARB develop a GIS layer of jurisdictions with anti-displacement policies.

¹⁰ Benner, Chris & Karner, Alex. (2016). Low-wage jobs-housing fit: identifying locations of affordable housing shortages. *Urban Geography*. 1-21. UC Davis Center for Regional Change has created a tool to measure JHFit.

¹¹

https://www.fresnocog.org/wp-content/uploads/publications/RTP/Peer_Exchange/JHFIT_2pager_Aug_2014.pdf. Accessed 4/30/2018.

¹² <http://www.apta.com/mediacenter/ptbenefits/Pages/default.aspx>. Accessed 04/26/2018.

¹³

http://www.tularecog.org/wp-content/uploads/2015/07/Tulare-County-RATP_benefits-of-active-transportation_v1.1web.pdf. Accessed 04/26/2018.

neighborhood livability; and positively impacts the “bottom line of households, businesses and cities” (*ibid.*) due to lower impact on streetscapes and reduced cost of ownership.

In the draft plan, we see a substantial increase in spending for roadway maintenance, and a moderate decrease for roadway capacity. We are encouraged to see more roadway funds being allocated towards fix-it first projects versus new roadway capacity. We are also pleased to see a substantial increase for active Transportation. However, we remain concerned that there is only a slight increase in funds allocated for transit. The 2018 plan should capitalize on the momentum established in the 2014 plan, summarized below in Table A, and continue to prioritize investment in transit. We recommend:

- Reallocation of Roadway capacity funding to *transit* as well as *active transportation and community enhancements* to improve public health, support infill development, and drive economic activity in existing cities. This reallocation would result in:
 - An increase in active transportation funding by 66% over the 2014 RTP/SCS to \$470 million,
 - An increase in transit funding by 33% over the 2014 RTP/SCS to \$4680 million, and
 - A commensurate reduction in roadway capacity by 38% to \$2025 million.

Table A. 2011-2018 SJCOG RTP/SCS Investments

Project Category	2011 RTP budget (in millions)	2014 RTP/SCS budget (in millions)	2011-2014 % shift	2018 draft RTP/SCS budget (in millions)	2014-2018 % shift
Roadway Operations, Maintenance, and Safety	\$3364	\$3875	+15.2%	\$4448	+14.8%
Transit	\$2747	\$3520	+\$773 +28.1%	\$3572	+\$52 +1.5%
Roadway Capacity (Mainline, Interchanges, Regional Roadways)	\$4441	\$3273	-\$1168 -26.3%	\$3121	-\$152 -4.6%
Active Transportation and Community Enhancements	\$158	\$282	+\$124 +78.5%	\$320	+\$38 +13.5%

Community Grants and Public Participation

Sustainable development is only possible through the involvement of all stakeholders. We would like to acknowledge the 2017 Measure K Bike, Ped, Safe Routes to School (SRTS), and Smart Growth Call for Projects, an innovative public process pilot with nearly \$20 million in combined funding. We support and encourage inclusion of the public and community-based organizations in the project proposal process, and encourage additional efforts. Additional opportunities for public input in transportation projects should be pursued; these efforts increase transparency and facilitate trust, offering both a more robust proposal process while increasing public investment in outcomes. Also, early public input surfaces conflicts that will become more challenging to address later in the process. We recommend:

- *SJCOG develop a grants program to improve active transportation, housing, and help meet SCS goals.* Other Northern California MPOs, including Fresno COG and the Metropolitan Transportation Commission (MTC) have developed grant programs to promote sustainable infrastructure and non-infrastructure such as Safe Routes to School. The Fresno COG's Sustainable Infrastructure Grant Program was approved in 2014 but only recently funded. In the Bay Area, the One Bay Area Grant (OBAG) program began in 2012 and resulted in an increase in active transportation investments, and resulted in 64 new Complete Streets policy resolutions¹⁴ in the Bay Area. Regional investments in these grants programs can also result in a stronger pipeline of projects that can successfully compete for state funding programs such as the state Active Transportation Program and the Affordable Housing and Sustainable Communities program.

The RTP/SCS public outreach mini-grants program should also be recognized as a step towards a more inclusive process. We appreciate the COG's efforts in reaching out to trusted community organizations to facilitate public input and providing funding to do so. We encourage the continuation of this program beyond the RTP/SCS update process in order to elevate the priorities of underserved communities.

Conclusion

SB 375 provides MPOs with the opportunity to provide clear guidance to local jurisdictions to work collaboratively to meet state-mandated greenhouse gas reduction goals. We understand and appreciate the inherent challenges in aligning transportation and land use planning. The landscape is changing: emerging technologies, policy innovations, shifting demographics, and economic challenges must be addressed. These challenges are best met through a collective effort of all stakeholders. We ask that the COG adopt a bold, ambitious, and achievable second round RTP/SCS that builds on the vision and priorities of the final 2014 plan.

We appreciate the ongoing efforts of COG staff, committees, and Council members, and we look forward to our continued work with you.

¹⁴ <https://escholarship.org/uc/item/49w1v7wz#main>. Accessed 4/30/2018.

Respectfully submitted,

Yolanda Park
Program Manager, Catholic Charities Diocese of Stockton

Christopher Escárcega
Regional Engagement Coordinator, ClimatePlan

Marty Martinez
Northern California Regional Policy Manager, Safe Routes to School National Partnership

Tammy Evans, RN, PHN, MSN, PhD
Director, San Joaquin County Public Health Services

Christina Peoples
Program Manager, Public Health Advocates

Jasmine Leek
Director, Third City Coalition

Esperanza Vielma
Executive Director/Co Founder, Cafe Co-op

Cc: Diane Nguyen, Deputy Director - Planning/Programming & Project Delivery
Kim Anderson, Senior Regional Planner
Ryan Niblock, Senior Regional Planner
Christine Corrales, Associate Regional Planner